

The ONE Group Recruitment Privacy Notice

Last Updated: January 1, 2020

This Employee Privacy Notice applies to all employees of The ONE Group Hospitality, Inc., The One Group, LLC, Kona Grill Acquisition, LLC., and all subsidiaries and affiliates (collectively, “The ONE Group”, “we”, “us”, and “our”).

1. WHO WE ARE

The ONE Group is a global leader in the hospitality industry that develops and operates upscale, high-energy restaurants and lounges and provides hospitality management services for hotels, casinos and other high-end venues both nationally and internationally. Our teams are essential to our success. We work hard to attract, hire, mentor and provide growth opportunities for energetic hospitality driven individuals.

This Privacy Notice applies to all personal data of job applicants processed by The ONE Group or in connection with the “Careers” pages on the following websites: <https://togrp.com/>; <https://stksteakhouse.com/>; and <https://www.konagrill.com/>.

2. DEFINITION OF PERSONAL INFORMATION

“Personal data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Under specific laws, personal information may include any information relating to a household.

2. ABOUT THE CAREERS SECTION OF OUR WEBSITES

You can apply for an open position within The ONE Group through the “Careers” section of the websites listed above. You may apply for specific vacancies posted by registering an account and submitting your application through the third-party platform, Harri. Our goal at The ONE Group is to recruit friendly, energetic, and highly-motivated individuals, who have a passion for hospitality. We strive for a premier culture that encompasses teamwork, collaboration, and value.

3. INFORMATION WE COLLECT

We collect personal data for recruitment purposes through our online application process. We also collect personal data for recruitment purposes through other communication means such as email and telephone. The categories of personal data collected are:

- Contact Information
- Resume
- Photo (optional)
- Work availability
- Skills

- Education
- Work experience
- Salary expectation
- Other information relevant to the job position posted

Please note that we rely upon our legitimate interest in operating our business for the processing of your personal data. We may also have regulatory obligations requiring us to process personal data.

If you choose not to provide us with certain personal data as requested, we may not be able to consider you for the job position, either because we are unable to assess your suitability or qualifications for the job role or because we are unable to meet our statutory obligations as a result of the lack of information provided. If you have any questions in this regard, please contact us. Our contact details are provided at the end of this policy.

We use cookies and other similar technologies to collect certain technical and usage information. For more information regarding our data collection using these technologies, please see our Privacy Policy at <https://stksteakhouse.com/privacy-policy/>.

California Consumer Privacy Act.

Pursuant to the § 1798.110 of the California Consumer Privacy Act (“CCPA”) the categories of personal information we have **collected about consumers** in the preceding 12 months are:

- Identifiers such as a real name, alias, postal address, email address, unique personal or online identifier, Internet Protocol address;
- Categories of personal information described in subdivision (e) of Section 1798.80, such as education and employment history;
- Characteristics of protected classifications under California or federal law;
- Internet or other electronic network activity information, including information regarding a consumer’s interaction with an Internet Website, application, or advertisement;
- Professional or employment-related information;

4. HOW WE USE COLLECTED INFORMATION

We collect and process personal data for recruitment purposes, including information that helps us manage applications and determine how you meet our organizational and job role selection criteria. We also communicate with you about your application including requests for additional information, interviews and notifications regarding the process. We process personal data as we, in our sole discretion, otherwise determine to be necessary to comply with applicable law. Most of the information collected is provided by you as part of your application. We may verify information provided such as your certifications or references.

5. HOW YOUR PERSONAL DATA IS SHARED

We do not sell your personal information to third parties.

We share your personal data with the following types of recipients:

- HR third-party service provider. We currently use Harri for our online recruitment, which is a human resource management platform for the hospitality industry offered by Harri (US) LLC, (“Harri”) located at 611 Broadway, Suite 309, New York, NY 10013, in the United States. Harri is committed to complying with the EU General

Data Protection Regulation (“GDPR”), and implements adequate protections, such as Standard Data Protection Clauses, for transfers of personal data from the European Economic Area (“EEA”) and United Kingdom (“UK”). We encourage you to visit their website and review their privacy policy at <https://harri.com/privacy> before applying for a job and providing your personal data. Please note we may change to a different recruitment services provider at any time without notice to you. We will take steps to ensure that protection of your data privacy rights is not impaired by such change.

- Other third-party service providers. We use third-party service providers for services like cloud hosting, analytics or other technical tools. These service providers only process your data as directed by us.
- Law enforcement or regulatory authorities, government agencies, courts of law or other third parties as required.

California Consumer Privacy Act.

Pursuant to the § 1798.115 of the CCPA the categories of personal information we have **disclosed about consumers for a business purpose** in the preceding 12 months are:

- Identifiers such as a real name, alias, postal address, email address, unique personal or online identifier, Internet Protocol address;
- Categories of personal information described in subdivision (e) of Section 1798.80, such as education and employment history;
- Characteristics of protected classifications under California or federal law;
- Internet or other electronic network activity information, including information regarding a consumer’s interaction with an Internet Website, application, or advertisement;
- Professional or employment-related information;

6. STORAGE OF YOUR PERSONAL DATA

Your information may be stored on computers and servers outside of your country where different data protection laws apply. We store information on servers located in the United States and may transfer information to any entity in The ONE Group. Your information will also be stored as described in the Privacy Policy of our third-party service provider, Harri, including to Ramallah, Palestine.

7. DATA SECURITY

We use technical and organizational measures to protect the personal data that we store, transmit, or otherwise process against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. The practical reality is, however, no data transmissions over the Internet can be guaranteed to be 100% secure. Therefore, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. If we learn of a data breach that is likely to affect the security of your personal data, we may attempt to notify you electronically via email so that you can take appropriate protective steps and/or by posting a notice on our website if a data breach occurs. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

8. DATA RETENTION

We retain your personal data for a reasonable time period to fulfill the processing purposes outlined above. For example, your personal data is retained directly by The ONE Group for up to one year after the application and selection process is finalized for each position posted. In the event you are not selected, The ONE Group deletes or destroys your personal data, unless we determine it necessary to retain for longer periods to fulfill our legitimate interests such as resolving disputes. In the event you are successful with your job application and commence employment with The ONE Group, your personal data is retained further and becomes part of your employee file.

9. YOUR RIGHTS

In certain jurisdictions, individuals have rights in relation to personal data. Where personal data is collected for recruitment purposes and that personal data is not required for regulatory or legal purposes or the like, we offer you the choice to limit the use and disclosure of your personal data.

For residents of the EEA and the UK, your rights consist of:

1. The right to be informed;
2. The right of access;
3. The right to rectification;
4. The right to erasure;
5. The right to restrict processing;
6. The right to data portability;
7. The right to object; and
8. The rights in relation to automated decision making and profiling; and
9. The right to lodge a complaint with a supervisory authority.

We encourage you contact us with your personal data inquiries or for assistance in modifying or updating your personal data and to exercise your rights. Our contact details are provided at the end of this Privacy Notice.

10. EFFECTIVE DATE AND AMENDMENTS

This document is effective as of the “Last update” indicated at the beginning of this notice. This document may be amended from time to time.

11. CONTACT US

Inquiries may be made to:

Attn: Privacy Officer
The ONE Group
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Denver, CO 80202
info@togrp.com
Phone: +1 (646) 624-2400